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Attorneys for Defendants

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MASOUMEH MOTEVALLI
ALAMOUTI, individually and as
successor-in-interest to Masoud
Rahmati, deceased; and MOSHEN
RAHMATI, individually,

Plaintiffs,

v.

COUNTY OF LOS ANGELES;
YVONNE PULLEN; RYAN GARCIA;
BRISEIDA NOCHEZ; RENE
AGUILAR ORNELAS; JOEL LEYVA;
ANDREW WISE; JASON
GONZALEZ; BART MARSHALL;
MICHAEL MAYBEE; and
OLUWASANMI OGUNJUMO,

Defendants.

Case No. 2:24-cv-05560-MWC-JC

*District Judge Michelle Williams Court
Mag. Judge Jacqueline Chooljian*

**NOTICE OF CONDITIONAL
SETTLEMENT AND REQUEST TO
VACATE ALL DATES**

1 **TO THE HONORABLE COURT:**

2 Plaintiffs, Masoumeh Motevalli Alamouti and Moshen Rahmati; and
3 Defendants, County of Los Angeles, Yvonne Pullen, Ryan Garcia, Briseida Nochez,
4 Rene Aguilar Ornelas, Joel Leyva, Andrew Wise, Jason Gonzalez, Bart Marshall,
5 Michael Maybee, and Oluwasanmi Ogunjumo—the parties to this action—by and
6 through their respective attorneys of record, hereby inform the Court of their
7 conditional settlement of this entire consolidated matter, and respectfully request
8 that the Court vacate all dates in this matter as the parties finalize their settlement,
9 and stipulate as follows:

10 WHEREAS, on June 16, 2025, the parties participated in a mediation with
11 ADR Panel Mediator Richard Copeland, during which the parties reached a
12 conditional settlement to resolve this entire case in its entirety.

13 WHEREAS, the conditional settlement of this action is subject to review and
14 approval by entities within and for the County of Los Angeles, including the
15 County’s Board of Supervisors. These reviews and approvals are expected to be
16 completed within twelve (12) months.

17 WHEREAS, given the parties’ conditional settlement and upcoming deadlines
18 in this case, the parties wish to make the Court aware of the conditional settlement
19 and are content to have the remaining dates and deadlines vacated based on the
20 conditional settlement.

21 WHEREAS, the parties respectfully request that all dates and deadlines be
22 vacated based on the parties’ conditional settlement of the entire action.

23 WHEREAS, following the necessary approvals of the conditional settlement
24 and payment of the settlement funds, the parties will file a stipulated dismissal of the
25 entire action with prejudice. The parties further request that the Court set a status
26 conference or a deadline for the parties to file a status report in approximately
27
28

1 twelve (12) months, at which time the parties can advise the Court of the status of
2 settlement, if dismissal documents have not yet been filed by that time.

3 WHEREAS, based on the above, good cause exists for granting the parties'
4 stipulation.

5
6 Respectfully submitted,

7
8 DATED: September 19, 2025

9 LAW OFFICES OF DALE K. GALIPO
10 LESSEM, NEWSTAT & TOOSON, LLP

11 By: /s/ Dale K. Galipo
12 Dale K. Galipo¹
13 Benjamin S. Levine
14 *Attorneys for Plaintiffs*

15
16 DATED: September 19, 2025

17 COLLINS + COLLINS LLP

18 By: /s/ Chandler A. Parker
19 Tomas A. Guterres
20 Chandler A. Parker
21 *Attorneys for Defendant County of Los*
22 *Angeles*

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28 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.